

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,))
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)

Plaintiffs,)

vs.)

4:05-CV-00329-TCK-SAJ

TYSON FOODS, INC., et al,)

Defendants.)

THE VIDEOTAPED DEPOSITION OF
BEVERLY SAUNDERS, produced as a witness on behalf
of the Plaintiffs in the above styled and numbered
cause, taken on the 19th day of January, 2007, in
the City of West Siloam Springs, County of Delaware,
State of Oklahoma, before me, Lisa A. Steinmeyer, a
Certified Shorthand Reporter, duly certified under
and by virtue of the laws of the State of Oklahoma.

<p style="text-align: right;">Page 10</p> <p>1 Q Did you review any other documents besides 2 these and the deposition of Mr. Saunders? 3 A No, sir, not that I recall. 4 Q How long was your meeting this morning with 5 Mr. Williams? 09:12AM 6 A We met at 7:30. 7 Q So how long was the meeting? 8 A About an hour and fifteen minutes. 9 Q Did you look at any documents in that meeting? 10 A Just the subpoena, this subpoena document. 09:13AM 11 Q All right. Did you speak to your husband 12 about his experience in his deposition or his 13 testimony? 14 A Yes. 15 Q All right, and what did the two of you discuss 09:13AM 16 about that? 17 A We really didn't discuss too much other than 18 just basically the conversations that were -- some 19 of the questions that were asked and that was 20 recorded in the -- in the deposition that I read. 09:13AM 21 Q All right. Did you have any discussions with 22 your husband after he gave his testimony in October 23 of 2006? 24 A After he -- yes. 25 Q And what did he say about that deposition in 09:13AM</p>	<p style="text-align: right;">Page 12</p> <p>1 purchased the poultry operation? 2 A We had bought the cattle farm in 1993 that is 3 just south of the poultry operation, and then we had 4 cattle before that that we had leased my husband's 5 grandparents' farm for about five years prior to 09:15AM 6 that. 7 Q And so approximately 1988 is when you 8 commenced your experience in cattle farming? 9 A Yes, sir, that's about correct. 10 Q Have you had any other type of farming 09:15AM 11 experience besides what you just described in the 12 cattle farm in 1998 to present? 13 A No, sir. 14 Q All right. Did you receive any formal 15 education or training with regard to raising cattle 09:15AM 16 or did you just learn as you did? 17 A We just kind of learned as we did, but I was 18 raised on a farm also. 19 Q We'll talk about that in a minute. Is -- 20 let's talk about that now. Did your father -- was 09:16AM 21 he also a grower, poultry grower? 22 A Yes, sir. 23 Q And for whom did he grow? 24 A Peterson Farms. 25 Q How long was he a grower for Peterson? 09:16AM</p>
<p style="text-align: right;">Page 11</p> <p>1 October or thereabouts? 2 A He just said that it was just -- he just told 3 me not to worry about it too much because it was 4 just simply question and answer and tell the truth I 5 guess. 09:14AM 6 Q Let's go back to the date, approximate time 7 frame when you and Mr. Saunders purchased the 8 poultry operation. That purchase was from a 9 gentleman by the name of Keith Morgan; is that 10 correct? 09:14AM 11 A Correct. 12 Q All right. Do you remember the approximate 13 date of that? 14 A The purchase was in February of '01. 15 Q Okay, and at the time that you entered into 09:14AM 16 the agreement to buy that poultry operation, did you 17 at that time have any formal training or education 18 with regard to poultry growing? 19 A No. 20 Q Did you have any formal training or education 09:14AM 21 with regard to cattle farming? 22 A Yes. We were experienced cattle farmers. I'm 23 not sure what you are calling formal training but -- 24 Q Well, let's talk a little bit. How long had 25 you been a cattle farmer at the time that you 09:15AM</p>	<p style="text-align: right;">Page 13</p> <p>1 A Probably 40 plus years. 2 Q And where was the location of his growing 3 operation? 4 A Decatur, Arkansas. 5 Q And so did you grow up in -- at that location? 09:16AM 6 A I grew up at Decatur, Arkansas, but my dad 7 didn't get real active in growing poultry until 8 after I left home. 9 Q Okay. So you didn't have any growing-up 10 experiences in the poultry farm; is that correct? 09:16AM 11 A Well, my grandparents raised. 12 Q All right. We'll talk about them first then. 13 So were you living at the grower operation when you 14 grew up? 15 A No, no, sir. 09:16AM 16 Q All right. How old were you when your father 17 got involved in the Peterson growing operation? 18 A In the growing operation side of it, I -- was 19 probably after I left home, I mean is when he built 20 his houses, but he was employed by Peterson Farms 09:17AM 21 prior to that. 22 Q All right. How old were you, though, when 23 that occurred? 24 A I would say probably 18. 25 Q What did he do for his employment, before his 09:17AM</p>

4 (Pages 10 to 13)

<p style="text-align: right;">Page 30</p> <p>1 Q Do you know whether you or Mr. Saunders have 2 requested sampling of the water on your property? 3 MR. WILLIAMS: Object to the form. 4 Q Let me ask you this way: Have you requested 5 and obtained any tests for the quality of the water 09:38AM 6 that is on your farm property? 7 A No, sir, I don't believe so, not that I 8 recall. 9 Q What is the source of the water that you use 10 for your personal use in your residence? 09:38AM 11 A It's a spring. 12 Q All right. Do you know whether that spring 13 has been sampled for water quality in the last ten 14 years? 15 A I don't know if it has or it hasn't. I don't 09:38AM 16 know if it has or if it hasn't. It seems I heard 17 that it has but I don't know that. 18 Q When you say you heard that it has, when did 19 you hear that? 20 A It seems as though maybe I heard it from a 09:39AM 21 neighbor that also uses water from the same spring. 22 Q All right, and do you know approximately when 23 that time was that you heard this? 24 A No, sir, I do not. 25 Q Do you have any estimate of the time when the 09:39AM</p>	<p style="text-align: right;">Page 32</p> <p>1 Q Has he ever had poultry waste applied to his 2 farm, if you know? 3 MS. THOMPSON: Object to the form. 4 A I would not know that. 5 Q And I'm asking from your personal knowledge. 09:40AM 6 You don't know that it's ever been applied to his 7 farm? 8 A Right. I do not know that. 9 Q Has he ever told you that he's used poultry 10 waste as a fertilizer? 09:40AM 11 MS. THOMPSON: Object to the form. 12 A No, he's never told me that. 13 Q How long has he been your neighbor? 14 A Well, he lived there before we moved there, 15 so -- 09:41AM 16 Q So you moved there in approximately the first 17 part of 2001 and he was already living there? 18 A Yes, sir. He's been there several years. 19 Q Okay. Where is that spring located that you 20 just referenced that each of you draw from? 09:41AM 21 A It's just south. It's right in front of 22 Dave's house. It's just south of our farm, poultry 23 farm. 24 Q Let me hand you what was Deposition Exhibit 4 25 in Mr. Saunders' deposition, which is -- this is the 09:41AM</p>
<p style="text-align: right;">Page 31</p> <p>1 samples might have been obtained? 2 A No, sir, I absolutely do not. 3 Q Is there -- is that source of water the same 4 source of water that you use in the growing of the 5 birds? 09:39AM 6 A Yes, sir. 7 Q I'm sorry. Do you supply the birds that same 8 source of water? 9 A Yes, sir. 10 Q Do you know whether or not Peterson Farms has 09:39AM 11 ever tested that water, sampled it and tested it for 12 water quality? 13 A They have not to my knowledge. 14 Q The person you identified as a neighbor that 15 told you about the sampling or possible sampling of 09:40AM 16 the spring, who was that person? 17 A Dave Morrison. 18 Q Morrison? 19 A Uh-huh. 20 Q Where is he located in relation to your farm? 09:40AM 21 A Just south. 22 Q Is he a poultry grower also? 23 A No. 24 Q Does he grow cattle? 25 A Yes. 09:40AM</p>	<p style="text-align: right;">Page 33</p> <p>1 cattle farm, is it not? 2 A I do not know. 3 Q Is the spring you're referring to located near 4 the poultry operation? 5 A Yes, sir. 09:41AM 6 Q As opposed to where the cattle are grazed? 7 A That's correct. 8 Q All right. 9 A It's just south of the poultry farm. The 10 cattle farm is actually north of the poultry farm. 09:41AM 11 Q Okay. Have you been involved in any other 12 poultry growing operations other than for Peterson 13 Farms that you described was purchased from Keith 14 Morgan? 15 A No, sir. 09:42AM 16 Q Have you been employed or done work for a 17 chamber of commerce? 18 A Yes, sir. 19 Q And which chamber was that? 20 A Gentry. 09:42AM 21 Q Tell me what your position was with them. 22 A It is. It currently is. 23 Q Currently? Well, tell me what you do for 24 them. 25 A I am the executive director. 09:42AM</p>

<p style="text-align: right;">Page 34</p> <p>1 Q Is that a paid position?</p> <p>2 A Yes, sir.</p> <p>3 Q How long have you worked for the chamber of</p> <p>4 commerce for Gentry?</p> <p>5 A Since June of '06. 09:43AM</p> <p>6 Q And how many hours do you work a week?</p> <p>7 A It varies upon what's going on. It's</p> <p>8 generally somewhere between 24 and 32 and extra for</p> <p>9 activities.</p> <p>10 Q Is that your sole employment at this time? 09:43AM</p> <p>11 A No, sir, it's not.</p> <p>12 Q Okay. Tell me your other employment.</p> <p>13 A I work -- I do some contract work for Poultry</p> <p>14 Partners.</p> <p>15 Q That's Poultry Partners, Inc.? 09:43AM</p> <p>16 A Uh-huh.</p> <p>17 Q And what do you do for them?</p> <p>18 A I actually do some bookkeeping, some -- that's</p> <p>19 pretty much the extent of it right now.</p> <p>20 Q How long have you worked for Poultry Partners, 09:44AM</p> <p>21 Inc.?</p> <p>22 A Since May of 2005.</p> <p>23 Q How many hours a week do you work for Poultry</p> <p>24 Partners, Inc., average?</p> <p>25 A Currently? 09:44AM</p>	<p style="text-align: right;">Page 36</p> <p>1 Q So I'll ask you again, do you have an hourly</p> <p>2 rate that's paid by Poultry Partners, Inc.?</p> <p>3 MR. WILLIAMS: She answered that question</p> <p>4 yes.</p> <p>5 Q Do you know what that hourly rate is? 09:45AM</p> <p>6 MR. WILLIAMS: If you know the answer to</p> <p>7 that question, you may answer it.</p> <p>8 A I know, yes, I know what the hourly rate is.</p> <p>9 Q And what is it?</p> <p>10 A The hourly rate is \$25 an hour. 09:45AM</p> <p>11 Q What are your duties at the chamber of</p> <p>12 commerce?</p> <p>13 A Membership recruitment, event planning,</p> <p>14 newsletter publication.</p> <p>15 Q Do you report to any person or persons? 09:45AM</p> <p>16 A Well, I report to the board, to a board,</p> <p>17 chamber of commerce board.</p> <p>18 Q How many are on that board?</p> <p>19 A Twelve.</p> <p>20 Q How often do you meet with the board? 09:46AM</p> <p>21 A Once a month -- the executive committee meets</p> <p>22 once a month. The board meets four times a year.</p> <p>23 Q All right, and is there an individual that you</p> <p>24 might report to or discuss your job responsibilities</p> <p>25 with besides the board, the whole board? 09:46AM</p>
<p style="text-align: right;">Page 35</p> <p>1 Q Currently.</p> <p>2 A Currently about -- probably about five hours a</p> <p>3 week.</p> <p>4 Q Is that different than what it was when you</p> <p>5 started? 09:44AM</p> <p>6 A Yes, sir.</p> <p>7 Q When you started, how many hours on average</p> <p>8 did you work for Poultry Partners?</p> <p>9 A About 20 to 30 hours a week.</p> <p>10 Q Is your work at Poultry Partners compensated? 09:44AM</p> <p>11 A Yes, sir.</p> <p>12 Q And are you paid by the hour or a salary; how</p> <p>13 is the structure?</p> <p>14 A By the hour.</p> <p>15 Q And what is the hourly rate? 09:44AM</p> <p>16 MR. WILLIAMS: We've objected to personal</p> <p>17 information of this regard.</p> <p>18 MR. GARREN: Well, you can object to it.</p> <p>19 You're going to instruct her not to answer it or --</p> <p>20 MR. WILLIAMS: It was my understanding from 09:45AM</p> <p>21 our prior conversations about this that you were</p> <p>22 going to honor that until you chose to raise it by a</p> <p>23 motion to compel.</p> <p>24 MR. GARREN: Actually I was honoring your</p> <p>25 refusing to produce those documents. 09:45AM</p>	<p style="text-align: right;">Page 37</p> <p>1 A At the chamber of commerce? Probably the</p> <p>2 president is who I communicate with the most but the</p> <p>3 president just changed with the new year.</p> <p>4 Q All right, but in your responsibilities, that</p> <p>5 would be the person typically you would communicate 09:46AM</p> <p>6 with about your activities?</p> <p>7 A Yes, sir.</p> <p>8 Q All right. How did you get the job at the</p> <p>9 chamber of commerce?</p> <p>10 A They called me and asked me. 09:46AM</p> <p>11 Q They meaning who?</p> <p>12 A The Gentry Chamber of Commerce president.</p> <p>13 Q And who was that?</p> <p>14 A Paul Galyean.</p> <p>15 Q And that was in June of '06? 09:47AM</p> <p>16 A He called me I think in May.</p> <p>17 Q Okay. Are any of your duties with the chamber</p> <p>18 -- have to do with raising money?</p> <p>19 A Membership drive, sir, and also the city</p> <p>20 directory is involved with -- the City Director is 09:47AM</p> <p>21 actually a publication of advertisements for local</p> <p>22 businesses.</p> <p>23 Q And is part of your responsibility in selling</p> <p>24 ads there also?</p> <p>25 A Yes, sir. 09:47AM</p>

10 (Pages 34 to 37)

<p style="text-align: right;">Page 174</p> <p>1 speculate about the intent of PCC or what her intent 2 is? If you're asking her what the intent of PCC is, 3 I object to the form. 4 Q You're in that ad; correct? 5 A I'm in the ad, yes. 02:12PM 6 Q And you have a speaking part in the ad that's 7 on the website, too, do you not? 8 A That's correct. 9 Q And are you intending for people to believe 10 what it is you're saying on that ad on that website? 02:12PM 11 A Yes, because I believe it myself. 12 Q Okay, and your intent is that people would go 13 to this website and hear your information that 14 you're giving; is that correct? 15 MR. WILLIAMS: Object to the form of the 02:13PM 16 question. 17 Q What is your intent of appearing in that ad? 18 A To educate people about the farmers and their 19 role. 20 Q And when you say educate people, does that 02:13PM 21 cause -- are you hopeful that may cause people to 22 change their thinking? 23 MR. McDANIEL: Object to the form. We've 24 circled through this ground about four times now. 25 MR. GARREN: Not with regard to this 02:13PM</p>	<p style="text-align: right;">Page 176</p> <p>1 Q Have you been asked to sign a document 2 authorizing your presence and your statements to be 3 used? 4 A Yes. 5 Q And did you bring that document with you when 02:14PM 6 the documents were produced under the subpoena? 7 A I don't even have that document. 8 Q All right, but you know you signed something? 9 A Yes. 10 Q Have you signed more than one document -- 02:15PM 11 A I don't know. 12 Q -- for that purpose? 13 A I don't believe so, Mr. Garren, but I don't 14 specifically remember if there was one page or two 15 pages or three pages. 02:15PM 16 Q Do you know who would have that document? 17 A I assume it's Littlefield. 18 Q All right, and do you know who operates, 19 manages or maintains the website? 20 A No, I do not. 02:15PM 21 MR. WILLIAMS: Which website? 22 Q The website oklahomapoultry.org. 23 A No, I do not. 24 Q That's the website we've been talking about 25 where your ads appear; correct? 02:15PM</p>
<p style="text-align: right;">Page 175</p> <p>1 particular website. 2 MR. WILLIAMS: That's my only concern to 3 raise an objection, Rick, is that I don't think she 4 has any control of that website. 5 MR. GARREN: I believe my question is 02:13PM 6 asking about what her intent is by appearing in 7 those ads on that website, and she has allowed her 8 presence, her statements to be used, and I think I 9 can ask her about why. 10 MR. GRAVES: I object to the form, too, 02:13PM 11 because I believe your questions with this regard -- 12 with regard to the ad itself, she's already 13 answered, and the fact that the ad -- where the ad 14 may be played, I'm not sure. You can ask her if her 15 intent changes depending where the ad is. 02:14PM 16 Q Is it your intention, ma'am, for people to be, 17 as you say, educated to believe what you have told 18 them? 19 A Yes, sir, it is. 20 Q All right. Do you have any knowledge who 02:14PM 21 places your ads on that website? 22 A No. I -- 23 Q Have you -- go ahead. 24 A And I assume it's back to Littlefield, but as 25 far as knowledge, no. 02:14PM</p>	<p style="text-align: right;">Page 177</p> <p>1 A Correct. 2 Q All right. Let's talk now about Poultry 3 Partners, Inc. Do you know when it was formed? 4 A I know when it was incorporated, when we had a 5 first meeting and that was March 31st, 2005. 02:16PM 6 Q Are you an incorporator of that corporation? 7 A I was in the very beginning but I resigned 8 from the board of directors when I became employed 9 by the board. 10 Q So you resigned what position? 02:16PM 11 A I was just a member of the board. 12 Q Okay. So as a board of director, you resigned 13 that position to become a manager? 14 A Uh-huh. 15 Q And that's a yes? 02:16PM 16 A Yes, sir. 17 Q Okay. Is the manager a paid position? 18 A Yes. 19 Q And is that what you told me earlier, it was 20 on an hourly basis? 02:16PM 21 A Yes. 22 Q And that's what you referred to as contract 23 work? 24 A Yes. 25 Q Do you know who the shareholders are of 02:16PM</p>

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<p>1 Poultry Partners, Inc.?</p> <p>2 A I don't believe Poultry Partners basically has</p> <p>3 shareholders. We are --</p> <p>4 Q Let me ask you this then: Do you know what</p> <p>5 kind of legal entity it is? 02:17PM</p> <p>6 A We are in the process of being a 501(c)(6).</p> <p>7 Q Okay. Do you understand that to be a</p> <p>8 corporation?</p> <p>9 A Yes, sir.</p> <p>10 Q And when you refer to 501(c)(6), you are 02:17PM</p> <p>11 referring to the Internal Revenue Code?</p> <p>12 A Yes.</p> <p>13 Q And that -- it would be referring to a</p> <p>14 non-profit corporation?</p> <p>15 A We are in the process of doing that, sir, yes. 02:17PM</p> <p>16 Q So Poultry Partners, Inc., is a corporation?</p> <p>17 A Yes, sir.</p> <p>18 Q And you're telling me there are no</p> <p>19 shareholders?</p> <p>20 A That is correct. 02:17PM</p> <p>21 Q Okay, and who were the original officers, if</p> <p>22 you know?</p> <p>23 A Yes. It's Keith Morgan.</p> <p>24 Q He's president?</p> <p>25 A Yes, sir. 02:17PM</p>	<p>1 Q That's a yes?</p> <p>2 A Yes, sir.</p> <p>3 Q Thank you. Are any of those officer positions</p> <p>4 paid?</p> <p>5 A No. 02:18PM</p> <p>6 Q Do you report your payments from Poultry</p> <p>7 Partners, Inc., on your individual income tax</p> <p>8 return?</p> <p>9 MR. WILLIAMS: We've also asserted</p> <p>10 privilege on behalf of the Saunders as to their 02:19PM</p> <p>11 personal financial information. That answer I don't</p> <p>12 think invades that privilege, but if we go any</p> <p>13 further, we will assert that. Sorry to interrupt.</p> <p>14 Q Do you report your payments from Poultry</p> <p>15 Partners, Inc., on your individual income tax 02:19PM</p> <p>16 return?</p> <p>17 A Yes, sir.</p> <p>18 Q Do you know what form you use to do that?</p> <p>19 A I don't know what form it is. My accountant</p> <p>20 could tell you what form it is. 02:19PM</p> <p>21 Q Who is that accountant?</p> <p>22 A Jerry Jackson.</p> <p>23 Q Jerry Jackson?</p> <p>24 A Uh-huh.</p> <p>25 Q And is he located where? 02:19PM</p>
Page 179	Page 181
<p>1 Q And he's -- has he always been president?</p> <p>2 A Yes, sir. Jerry Hutton.</p> <p>3 Q And what is his --</p> <p>4 A Vice-president.</p> <p>5 Q And has he always been vice-president? 02:17PM</p> <p>6 A Yes, sir, and Steve Bryan.</p> <p>7 Q Steve Bryan?</p> <p>8 A Bryan, B-R-Y-A-N.</p> <p>9 Q And his position is?</p> <p>10 A Board member. 02:18PM</p> <p>11 Q All right.</p> <p>12 A Randy Allen.</p> <p>13 Q His position is?</p> <p>14 A Board member. Brent Bolen.</p> <p>15 Q Spell his last name, please. 02:18PM</p> <p>16 A B-O-L-E-N.</p> <p>17 Q Is he --</p> <p>18 A Board member, and Tom McCain.</p> <p>19 Q Spell his last name.</p> <p>20 A M-C-C-A-I-N. 02:18PM</p> <p>21 Q And is he a board member?</p> <p>22 A Yes, sir.</p> <p>23 Q So the only officers are president and</p> <p>24 vice-president?</p> <p>25 A Uh-huh. 02:18PM</p>	<p>1 A Fayetteville. Aren't we doing just exactly</p> <p>2 what he said, if we went any further, we weren't</p> <p>3 going to do?</p> <p>4 MR. WILLIAMS: That doesn't invade it. Go</p> <p>5 ahead. 02:20PM</p> <p>6 A Okay, okay.</p> <p>7 Q I'd ask you to look at the exhibits at Page</p> <p>8 696, the Saunders exhibit page. Can you tell me</p> <p>9 what that document is?</p> <p>10 A It's a proposed budget for July 2006 to 2007 02:20PM</p> <p>11 that I submitted to the board of directors.</p> <p>12 Q Did you prepare this budget?</p> <p>13 A Yes, I did.</p> <p>14 Q Was there a budget for the year that preceded</p> <p>15 this, that -- the period here is July of '06 to July 02:20PM</p> <p>16 of '07. Was there a budget also for July '05 to</p> <p>17 July '06?</p> <p>18 A To prepare a budget, I don't believe there</p> <p>19 was, no, sir.</p> <p>20 Q Are you familiar with the terms of the 02:20PM</p> <p>21 expenses for '05-'06 for Poultry Partners?</p> <p>22 A Am I familiar with them?</p> <p>23 Q Yes, ma'am.</p> <p>24 A Yes.</p> <p>25 Q Okay. Are they similar in nature to what we 02:21PM</p>

46 (Pages 178 to 181)

<p style="text-align: right;">Page 182</p> <p>1 see in this exhibit, Page 696? When I say are, were</p> <p>2 they similar?</p> <p>3 A Similar, yes, similar.</p> <p>4 Q Okay, all right, and it shows under expenses</p> <p>5 wages. Who would receive wages at Poultry Partners, 02:21PM</p> <p>6 Inc.?</p> <p>7 A That would be me.</p> <p>8 Q Is there anyone else that would receive wages?</p> <p>9 A There's been just a little bit of folding like</p> <p>10 for newsletters and stuff like that, but for the 02:21PM</p> <p>11 most part, no, sir. I mean just a small amount.</p> <p>12 Q Okay. Would that small amount be less than a</p> <p>13 thousand dollars?</p> <p>14 A Yes, absolutely.</p> <p>15 Q Okay, and the category under travel, who would 02:21PM</p> <p>16 be a recipient of those funds?</p> <p>17 A That would be me.</p> <p>18 Q All right. Does anyone else receive travel</p> <p>19 reimbursements?</p> <p>20 A No, sir. 02:22PM</p> <p>21 Q And the phone that's listed here for \$75 a</p> <p>22 month, where is that phone located?</p> <p>23 A It's in my house.</p> <p>24 Q All right, and what is the phone number to</p> <p>25 that phone? 02:22PM</p>	<p style="text-align: right;">Page 184</p> <p>1 a bank account of those funds?</p> <p>2 A Yes.</p> <p>3 Q And what bank is used for that purpose?</p> <p>4 A Grand Savings Bank.</p> <p>5 Q And is there a location that you frequent? 02:24PM</p> <p>6 A No. I do a lot of it by mail.</p> <p>7 Q If you were going to the bank to access the</p> <p>8 account, what bank would you go to?</p> <p>9 A Jay.</p> <p>10 Q All right. Tell me about the dues in Poultry 02:24PM</p> <p>11 Partners, Inc. Is it a voluntary contribution?</p> <p>12 A That's correct.</p> <p>13 Q Are there any instances of mandatory dues to</p> <p>14 be a member?</p> <p>15 A No. 02:24PM</p> <p>16 Q Can you be a member and not pay dues?</p> <p>17 A Yes.</p> <p>18 Q All right, and how many dues paying members do</p> <p>19 you have?</p> <p>20 A I don't have that information with me. 02:24PM</p> <p>21 Just --</p> <p>22 Q Do you have an estimate of the percentage of</p> <p>23 dues paying members versus non-dues paying members?</p> <p>24 A No, sir, I don't. I'm afraid I couldn't even</p> <p>25 guess close. I wouldn't want to do that. 02:25PM</p>
<p style="text-align: right;">Page 183</p> <p>1 A 422 -- 918-422-4030.</p> <p>2 Q And is that a phone that you use for personal</p> <p>3 use also?</p> <p>4 A No. It's Poultry Partners.</p> <p>5 Q Is it a separate line into your house? 02:22PM</p> <p>6 A Yes, sir, it is.</p> <p>7 Q And do you have another line for your personal</p> <p>8 use at your residence?</p> <p>9 A Yes, I do.</p> <p>10 Q What is the number that is your personal line? 02:22PM</p> <p>11 A 918-422-6187.</p> <p>12 Q The annual liability insurance that's shown on</p> <p>13 this Page 696, what is that for?</p> <p>14 A It's the directors and officers insurance.</p> <p>15 Q Has that been in effect the entire time for 02:23PM</p> <p>16 Poultry Partners, Inc.?</p> <p>17 A Not the entire time but most of the entire</p> <p>18 time.</p> <p>19 Q Okay. Do you as a manager keep track of the</p> <p>20 sources of income to Poultry Partners, Inc.? 02:23PM</p> <p>21 A Yes.</p> <p>22 Q Are you responsible for collecting those</p> <p>23 funds?</p> <p>24 A Yes.</p> <p>25 Q Are you responsible for making the deposit to 02:23PM</p>	<p style="text-align: right;">Page 185</p> <p>1 Q Okay. Do you have an estimate of how much of</p> <p>2 a \$57,700 budget the dues is able to satisfy?</p> <p>3 A No.</p> <p>4 Q In your opinion would the dues be sufficient</p> <p>5 to pay your wages alone? 02:25PM</p> <p>6 A I couldn't tell you that.</p> <p>7 Q Without -- excluding your wages now, would the</p> <p>8 dues be sufficient to pay just the mailings of</p> <p>9 \$4,800 a year?</p> <p>10 A Mr. Garren, if I couldn't tell you if they 02:25PM</p> <p>11 could pay my wages, I don't know. I don't have</p> <p>12 those numbers in front of me. I don't feel like I</p> <p>13 can give you accurate answers.</p> <p>14 Q Where would you keep those numbers?</p> <p>15 A They're at home. 02:25PM</p> <p>16 Q All right, and are they in -- what form are</p> <p>17 they kept?</p> <p>18 A They're on my -- a lot of them are on my</p> <p>19 computer, yeah.</p> <p>20 Q Do you have any hard copy documents that are 02:26PM</p> <p>21 also kept by you?</p> <p>22 A I don't have all of the hard copy documents in</p> <p>23 my possession, no.</p> <p>24 Q Where do the bank statements go for Poultry</p> <p>25 Partners? 02:26PM</p>

47 (Pages 182 to 185)

<p style="text-align: right;">Page 186</p> <p>1 A They go in a file in my home.</p> <p>2 Q Okay. Do they come to your home?</p> <p>3 A Yes, sir -- no, sir. They go to Poultry Partners' mailing address.</p> <p>4</p> <p>5 Q Is that a P. O. Box? 02:26PM</p> <p>6 A P. O. Box 220.</p> <p>7 Q And do you pick up that mail?</p> <p>8 A I do mostly.</p> <p>9 Q I'll ask you to look at Page 694. Is that a</p> <p>10 copy of the document you authored? 02:27PM</p> <p>11 A Yes, it is. The back sheet is an attachment</p> <p>12 to the Page 654 where it says attached is the</p> <p>13 letter.</p> <p>14 Q Okay, and it refers in the first sentence to a</p> <p>15 generous donation from Peterson Farms this past 02:27PM</p> <p>16 year. When did that occur?</p> <p>17 A It was the past year, the year prior to.</p> <p>18 Q So in the year '05?</p> <p>19 A Yes, sir, yes, sir.</p> <p>20 Q And do you know what that generous 02:27PM</p> <p>21 contribution or donation amount was?</p> <p>22 A I couldn't tell you.</p> <p>23 Q Do you have any estimate?</p> <p>24 MR. WILLIAMS: That information again we're</p> <p>25 asserting as privileged. 02:27PM</p>	<p style="text-align: right;">Page 188</p> <p>1 Q Let's look at Page 729, if you would, please.</p> <p>2 Refresh your memory and then let me know you looked</p> <p>3 at it.</p> <p>4 A Uh-huh.</p> <p>5 Q Did somebody donate a cruise package or trip 02:30PM</p> <p>6 to Poultry Partners, Inc.?</p> <p>7 A Yes.</p> <p>8 Q And was that someone a poultry partner -- I</p> <p>9 mean a poultry integrator defendant?</p> <p>10 A Actually, no. This came from Littlefield. 02:30PM</p> <p>11 Q Okay. Who donated the trip that's referenced</p> <p>12 as being auctioned?</p> <p>13 MR. McDANIEL: Assumes facts not --</p> <p>14 MR. WILLIAMS: We have the same privilege</p> <p>15 with regard to the donation. 02:30PM</p> <p>16 MR. GARREN: Well, I can ask the question</p> <p>17 so you can assert it so we can make a record.</p> <p>18 MR. McDANIEL: It assumes facts not in</p> <p>19 evidence. That's my objection.</p> <p>20 MR. MILLER: The Littlefield thing wasn't 02:30PM</p> <p>21 objectionable, though? I'm sorry, I'm just asking.</p> <p>22 MR. WILLIAMS: I didn't realize where we</p> <p>23 were going until it was already asked.</p> <p>24 Q Okay. So when you said this was Littlefield,</p> <p>25 what did you mean? 02:30PM</p>
<p style="text-align: right;">Page 187</p> <p>1 Q Do you have a record in your possession that</p> <p>2 would tell you that?</p> <p>3 A Yes, sir.</p> <p>4 Q Looking at Page 654, does Poultry Partners 02:28PM</p> <p>5 receive matching contributions from any poultry</p> <p>6 integrators as referenced in this E-mail?</p> <p>7 A We did for a short period.</p> <p>8 Q Do you --</p> <p>9 A We did -- the companies did a mailing. Some 02:28PM</p> <p>10 of them did a mailing; some of them didn't. We</p> <p>11 asked them to do a mailing and we asked them to</p> <p>12 match contributions, and that's what this letter is</p> <p>13 referring to and that's what this E-mail is</p> <p>14 referring to, and that was a short time, probably</p> <p>15 three months maybe. 02:28PM</p> <p>16 Q In what year?</p> <p>17 A Whatever this is dated. The year 2006, yeah.</p> <p>18 Q All right, and do you know which companies</p> <p>19 contributed?</p> <p>20 A Yes. 02:29PM</p> <p>21 Q Which ones?</p> <p>22 MR. WILLIAMS: Same privilege.</p> <p>23 Q Are you refusing to answer that question then?</p> <p>24 A Yes.</p> <p>25 MR. WILLIAMS: I'm directing her. 02:29PM</p>	<p style="text-align: right;">Page 189</p> <p>1 A I'm sorry. I thought I said this came from</p> <p>2 Laurie at Littlefield.</p> <p>3 Q The E-mail did?</p> <p>4 A The E-mail did, yes.</p> <p>5 Q Correct. Okay. That's what I thought I 02:31PM</p> <p>6 understood you to say also. Now, the -- but you're</p> <p>7 refusing to tell me who donated the cruise ship that</p> <p>8 was auctioned; is that what I understand your</p> <p>9 testimony to be?</p> <p>10 MR. McDANIEL: Object to the form. 02:31PM</p> <p>11 MR. WILLIAMS: Not a cruise ship.</p> <p>12 Q Okay. A trip on a cruise ship, was that a</p> <p>13 donation made to Poultry Partners, Inc.?</p> <p>14 MR. McDANIEL: Objection.</p> <p>15 A Yes. 02:31PM</p> <p>16 Q And was that cruise auctioned by Poultry</p> <p>17 Partners, Inc.?</p> <p>18 A Yes, it was.</p> <p>19 Q And how was that auction conducted?</p> <p>20 A By phone. 02:31PM</p> <p>21 Q So people called in and made bids?</p> <p>22 A That's correct.</p> <p>23 Q And how would they know whether they bid</p> <p>24 higher or lower than the one who previously called</p> <p>25 in? 02:31PM</p>

48 (Pages 186 to 189)

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1 A I posted the high bids on the website for
 2 awhile until it got down to two people at the last
 3 hour and then when one would bid, I would call the
 4 other one to see, to advise them where we were at.
 5 Q And was this trip in fact awarded to one of 02:32PM
 6 the bidders?
 7 A Yes, sir.
 8 Q And I take it by your E-mail here the bid was
 9 \$3,700?
 10 A That is correct. 02:32PM
 11 Q And did those funds go to Poultry Partners,
 12 Inc.?
 13 A Yes, sir.
 14 Q All right. Did any of those funds go to the
 15 contributor of that cruise package? 02:32PM
 16 A Poultry Partners.
 17 Q Got all the funds?
 18 A Right, yes.
 19 Q And who made the contribution of the cruise
 20 package? 02:32PM
 21 MR. WILLIAMS: At which point we would
 22 assert the privilege.
 23 Q As far as you know, the person who bought it
 24 was able to attend the cruise?
 25 A Yeah, I think so. I heard it was wonderful. 02:32PM

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1 Q Let's look at Page 517, if you would, Miss
 2 Saunders. Is this an E-mail at the top of the page
 3 between the two first bars going across the page
 4 that you authored addressed to Laurie?
 5 A Yes, sir. 02:33PM
 6 Q And that's Laurie Tilley, again, a person at
 7 Littlefield you've been referring to?
 8 A That is correct.
 9 Q Did you in fact receive the \$50,000 for -- as
 10 referred to in this E-mail? 02:33PM
 11 MR. WILLIAMS: I don't think that question
 12 raises a privilege.
 13 A You think that's okay?
 14 MR. WILLIAMS: Uh-huh.
 15 A Yes, sir. 02:34PM
 16 Q So it was -- so when you say we are getting
 17 50,000 up front from the integrators, that money was
 18 received for Poultry Partners?
 19 A Yes, sir.
 20 Q And did you deposit those funds into the 02:34PM
 21 account as you do the other funds you testified to?
 22 A Yes, sir.
 23 Q All right, and were those funds received then
 24 in the year 2005?
 25 A Yes, sir. 02:34PM

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1 Q Who is meant by the term, quote, integrators
 2 in this E-mail?
 3 MR. WILLIAMS: Privilege is invoked with
 4 regard to that.
 5 Q So you're not going to tell me; is that 02:34PM
 6 correct, Miss Saunders?
 7 A That's correct.
 8 Q Okay. Does Laurie Tilley work for any of the
 9 integrators?
 10 A Laurie Tilley works for Littlefield. 02:35PM
 11 Q As far as you know she works there full time?
 12 A As far as I know.
 13 Q Did you ever discuss with her who the
 14 integrators were as you referenced in this E-mail?
 15 A Sir, I couldn't tell you if I did or if I 02:35PM
 16 didn't. I could have but I don't recall a specific
 17 conversation right now because it wasn't a secret
 18 right up front that we were getting seed money. It
 19 was published in the Tulsa World.
 20 Q Did you receive salary in the year '05 into 02:35PM
 21 '06 from Poultry Partners, Inc.?
 22 A Yes. I received wages, yes, contract wages.
 23 Q And were they comparable to the wages of the
 24 36,000 we saw in '06-'07?
 25 A It changed a lot because, as I told you 02:36PM

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1 earlier, I'm not working near the hours that I used
 2 to work.
 3 Q So would your compensation have been greater
 4 in '05 and '06 when you worked more hours?
 5 A I would have to check my records. I think it 02:36PM
 6 would have been pretty close to even.
 7 Q About the same you mean?
 8 A Yes, sir.
 9 MR. WILLIAMS: When you get to a stopping
 10 point, can you take a short break? 02:36PM
 11 MR. GARREN: Are you ready? I'm happy to,
 12 yeah.
 13 VIDEOGRAPHER: We're going off the Record.
 14 The time is 2:36 p.m.
 15 (Following a short recess at 2:37 p.m.,
 16 proceedings continued on the Record at 2:51 p.m.)
 17 VIDEOGRAPHER: We're back on the Record.
 18 The time is 2:51 p.m.
 19 Q Mrs. Saunders, can you give me an estimate of 02:52PM
 20 the average amount that a dues member, a dues paying
 21 member would pay to Poultry Partners, Inc.?
 22 A I have not averaged it, sir.
 23 Q You mentioned that Poultry Partners, Inc., had
 24 an annual meeting in '06. Is that the only annual
 25 meeting they've had? 02:52PM

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